MAR | 7 1998

Ross Vincent, Chair Environmental Quality Strategy Team Office of the Chair Sierra Club P.O. Box 4375 Pueblo, CO 81003-0375

Dear Mr. Vincent:

Dr. Goldman has asked me to respond to your letter of February 3, 1998, in which you express the Sierra Club's interest in exploring and discussing with the Environmental Protection Agency (EPA), alternatives to incineration of PCBs and other wastes as a waste treatment option. The following are existing forums, both inside and outside EPA, which are looking into better, faster, and cheaper environmental technologies to allow interested parties, both domestic and foreign, to make more informed waste management decisions about innovative waste disposal technologies that exist or are being developed.

In the Defense Authorization Act for Fiscal Year 1997, Congress provided \$40 million to identify and demonstrate not less than two alternatives to the baseline incineration process for the demiliterization of assembled chemical munitions. In proceeding with this new program for examining alternative technologies, the Department of Defense and others interested in these issues have stated the need to integrate stakeholder involvement into the process of developing technically sound and publicly acceptable alternative technologies. The Keystone Center, a non-profit organization specializing in the facilitation and mediation of national and international environmental and health policy disputes, is developing and facilitating a process for ensuring stakeholder involvement throughout the process for assessing alternative technologies. To date, a number of public dialogue meetings have been held with stakeholders to discuss developing the criteria for assessing alternative technologies. From September, 1998, through December, 1998, not less than two technologies will be demonstrated using the assessment criteria developed by the stakeholders. Members of my staff in the PCB program have been actively following the progress of this forum.

In 1990, in recognition of the shortcomings of some of the traditional remediation technologies, EPA created and has sustained the Technology and Innovation Office (TIO) in the

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municipal wastes by identifying and enhancing incentives to increase innovative technology application. Innovation in thermal methods, bioremediation, physical/chemical techniques and groundwater extraction and treatment technologies is of principal interest. TIO also assists in the implementation of demonstrations of technologies under the Superfund Innovation Technology Evaluation (SITE) program. The SITE program was established in 1986 to advance the development, evaluation, and commercialization of innovative technologies used to clean up and assess hazardous waste sites. The SITE program is currently involved with more than 200 projects in various stages of completion. Some of the technologies that have been evaluated include: soil vapor extraction, thermal desorbtion, advanced oxidation, electrokinetics, biodegradation, soil washing, *in situ* vitrification, dechlorination, solvent extraction, chemical treatment, and air sparging. The Director of TIO is Walt Kovalick and he can be reached at 703-603-9910.

In 1995, EPA's Office of Research and Development established a five-year pilot program called the Environmental Technology Verification (ETV) Program to verify the performance of innovative technologies. In it's first two years of operation, 12 new environmental technologies have been verified and 35 additional verifications are underway. EPA expects to verify the performance of over 300 innovative technologies within ten years, greatly expanding investment options and providing decision makers with more assurance when confronted with major technology investment decisions. The Director of the Technology Coordination Staff is Penny Hansen and she can be reached at 202-260-2600.

Canada, Mexico, and the U.S. have long recognized the need to cooperate on a range of environmental management issues to protect human health and the environment in the region. One area of cooperation is the sound management of chemicals of concern. To that end, the Commission for Environmental Cooperation (CEC), established under the North American Agreement on Environmental Cooperation (NAAEC), formed the PCB Task Force which has developed a "Regional Action Plan (RAP) on PCB Management" to organize and encourage individual and joint actions by these three countries to provide sound life cycle management of PCBs in the region. Working through the CEC, these three countries established the PCB Task Force to develop the RAP for implementation. This forum includes the exchange of disposal technology information. EPA believes that this forum provides the best opportunity to address the relevant issues of technology development and transfer, the proximity principle for waste management, long range transport of pollutants, and barriers to the implementation of innovative disposal technologies or waste management strategies. EPA also believes that exploring regional and global solutions to the control of persistent bioaccumulators, such as PCBs, is the most promising approach for solving this pollution problem which does not recognize political, let alone property boundaries. Therefore, I propose that we use the fora provided by the CEC to conduct these discussions on innovative technologies and strategies for the management of PCBs and other similar wastes.

For years waste generators, disposal facility owners and operators and Federal and State regulators have favored more traditional and proven technologies, rather than new ones. These efforts discussed above will provide credible performance data and increase acceptance and use of better, faster, and cheaper environmental technologies.

Within the Fibers and Organics Branch in the Office of Pollution Prevention and Toxics, David Hannemann and Peter Gimlin are the PCB program representatives to the CEC's PCB Task Force, Tom Simons is the leader of the PCB Disposal Policy Team and Dody Dodahara and Winston Lue are the technical experts in the Branch most knowledgeable about PCB disposal. They can be reached at 202-260-3933. They will be working through the Task Force to address PCB issues and will work with you and your organization.

Sincerely,

William H. Sanders III, Director Office of Pollution Prevention and Toxics

cc: Lynn Goldman (7401) Marsha Coleman-Adebayo (7401) John Melone (7404) Walt Kovalick (5102G) Penny Hansen (8301)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

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OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

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municipal wastes by identifying and enhancing incentives to increase innovative technology application. Innovation in thermal methods, bioremediation, physical/chemical techniques and groundwater extraction and treatment technologies is of principal interest. TIO also assists in the implementation of demonstrations of technologies under the Superfund Innovation Technology Evaluation (SITE) program. The SITE program was established in 1986 to advance the development, evaluation, and commercialization of innovative technologies used to clean up and assess hazardous waste sites. The SITE program is currently involved with more than 200 projects in various stages of completion. Some of the technologies that have been evaluated include: soil vapor extraction, thermal desorbtion, advanced oxidation, electrokinetics, biodegradation, soil washing, *in situ* vitrification, dechlorination, solvent extraction, chemical treatment, and air sparging. The Director of TIO is Walt Kovalick and he can be reached at 703-603-9910.

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